

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

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|--------------|---|----------------------------|
| IN RE: | : | |
| | : | Case No: 1-17-bk-04326-HWV |
| JOHN W. SHEA | : | |
| Debtor, | : | |
| | : | Chapter 13 |

DEBTOR'S MOTION TO TERMINATE WAGE ATTACHMENT

AND NOW COMES, Debtor, John W. Shea, by and through his attorneys, Jacobson, Julius & Harshberger, who hereby files this Motion to Terminate Wage Attachment and in support thereof states:

1. Debtor filed a Chapter 13 Petition on or about October 17, 2017.
2. This Honorable Court approved a wage attachment of Debtor's wages on December 7, 2020 and further directed Capital Blue Cross to withhold funds from Debtor's wages to pay the Chapter 13 Trustee.
3. Debtor files this motion seeking an order terminating said wage attachment because the case is now complete, and no further payments are due to the Chapter 13 Trustee.

WHEREFORE, Debtor respectfully requests that this Court enter an order directing the above-mentioned employer to terminate the payments to the Chapter 13 Trustee.

Respectfully Submitted,

JACOBSON, JULIUS AND HARSHBERGER

Dated: October 25, 2024

/s/ Chad J. Julius
ID# 209496
8150 Derry Street
Harrisburg, PA 17111.5260
717.909.5858

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| Debtor, | : | |
| | : | Chapter 13 |

PROOF OF SERVICE

AND NOW, this 25th day of October, 2024, I, Dera Shade, with Jacobson, Julius & Harshberger, attorneys for the Debtor, hereby certify that on this day I served the within *Motion to Terminate Wage Attachment* upon the following persons by forwarding the same via CM/ECF and/or first-class mail—

Jack N. Zaharopoulos, Esq.
8125 Adams Drive Suite A
Hummelstown, PA 17036

United States Trustee
The Sylvia H. Rambo US Courthouse
1501 North 6th Street, Bankruptcy Courtroom 8, 4th Floor
Harrisburg, PA 17102

Capital Blue Cross
Payroll Dept.
2500 Elmerton Ave.
Harrisburg, PA 17177

By: /s/Dera Shade
Dera Shade, Paralegal

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| Debtor, | : | |
| | : | Chapter 13 |

UPON CONSIDERATION of the above-referenced Debtor, John W. Shea, having filed a *Motion to Terminate Wage Attachment* under Chapter 13 of the Bankruptcy Code;

IT IS HEREBY ORDERED that the Motion is GRANTED and that the entity from whom Debtor receives income:

Capital Blue Cross
Payroll Dept.
2500 Elmerton Ave.
Harrisburg, PA 17177

shall terminate all deductions and wage attachments remitted to Chapter 13 Trustee, Jack N. Zaharopoulos, from said Debtor's income, previously ordered by this Honorable Court on December 7, 2020.